

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHAPMAN ASSOCIATES GENERAL)
BUSINESS, INC.,)

Plaintiff,)

v.)

12-2302

INTEGRATED FREIGHT)
CORPORATION,)

Defendant.)

PLAINTIFF'S MOTION FOR TURNOVER ORDER AGAINST THIRD PARTY

Judgment creditor Chapman Associates General Business, Inc. hereby requests that this Court enter an Order directing Bank of America to turn over the funds held in the bank account held in the name of judgment debtor Integrated Freight Corporation ("IFCR") and that have been frozen pursuant to a Third Party Citation to Discover Assets directed to Bank of America. In support of its motion, Chapman states as follows:

1. On June 12, 2012, Chapman obtained a judgment against Integrated Freight Corporation in the amount of \$835,907.91.

2. Thereafter, Chapman initiated supplementary proceedings by issuing citations to discover assets, including a citation to Bank of America, attached as Exhibit A.

3. On June 5, 2015, Bank of America answered the citation, indicating that that it was holding \$10,828.48 in a bank account belonging to IFCR. A copy of Bank of America's answer is attached as Exhibit B.

4. Pursuant to 735 ILCS 5/2-1402(c), Chapman is entitled to entry of an order entering judgment in favor of Chapman Associates General Business, Inc. and Against Bank of America for \$10,828.48, and directing Bank of America to turn over \$10,828.48 in partial satisfaction of the judgment against IFCR.

WHEREFORE, Chapman Associates General Business, Inc., respectfully requests that this Court enter a judgment against Bank of America and for the benefit of Chapman Associates General Business, Inc. in the amount of \$10,828.48 and directing Bank of America to turn over that amount to counsel for Chapman.

Dated: June 19, 2015

Chapman Associates General Business, Inc.

By: /s/ Wesley E. Johnson
One of its attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on June 19, 2015, I will serve a copy of the attached **Plaintiff's Motion for Turnover**, on all parties in the manner indicated below.

TO: Via Personal Delivery
Bank of America
105 W. Madison, Ste. 101
Chicago, IL 60602

Via US Mail
Integrated Freight Corporation
c/o Henry P. Hoffman
8374 Market Street, #478
Bradenton, FL 34202

By: /s/ Wesley E. Johnson